

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MICK HAIG PRODUCTIONS, E.K., §
HATTINGER STR. 88 §
D-44789 BOCHUM, GERMANY, §
§
PLAINTIFF, §
§
VS. §
§
DOES 1-670 § C.A. NO.: 3:10-cv-01900-N
§
§
DEFENDANTS. §

**MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE**

Plaintiff, by counsel, pursuant to the Federal Rules of Civil Procedure, respectfully moves this Court for leave to take discovery prior to a Rule 26(f) conference for the reasons stated in its accompanying Memorandum of Points & Authorities. Plaintiff requests a hearing on this matter on an expedited basis.

CERTIFICATE OF CONFERENCE / INABILITY TO CONFER

The defendants in this case are “John Doe” defendants because their true names are unknown at this time. Plaintiff currently has only the unique internet protocol address (“IP” address) of each defendant as listed in Exhibit A to Plaintiff’s Complaint. The purpose of this motion is to allow discovery to obtain the true identities and contact information of the defendants from their internet service providers based on their unique IP addresses, by which Plaintiff witnessed the unlawful activities at issue in this action. Without contact information for the defendants, it is impossible to schedule a discovery conference.

Respectfully Submitted,

Mick Haig Productions, e.K.

DATED: September 30, 2010

s/ *E. F. Stone*

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